

Dear Members of the Planning and Housing Committee,

RE: PH 3.16 - Expanding Housing Options in Neighbourhoods: Multiplex Study - Final Report

About More Neighbours Toronto

<u>More Neighbours Toronto</u> is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

We are writing today in support of the recommendations by City Planning to legalize multiplexes citywide throughout Toronto. The staff recommended multiplex proposal is the real action we need to tackle the housing crisis. To make building multiplexes actually feasible as-of-right and not just legal in-name, we support the staff recommendations to:

- Exempt multiplexes from floor-space index (FSI) maximums.
- Increase maximum height for multiplexes to at least 10m.
- Relax stepback requirements.
- Allow secure front entrances for all units.

Further amendments to allow 12m height without stepbacks would also allow more family-sized homes. 10m is insufficient for 4 storeys, and allowing 4 storeys and 4 units on all residential lots everywhere is in line with the <u>Housing Affordability Task Force report from</u> 2022.

Legalizing multiplexes is an important first step towards addressing inequality and the housing crisis in Toronto. Twenty-five years on from amalgamation, Toronto is still a divided city, with multiplexes present in some parts of the old city but disallowed in the vast majority of the city's residential-zoned land. Allowing gentle density in all neighbourhoods is critical to becoming the welcoming city of diversity and opportunity that we aspire to be, and will provide further diversity in housing options to fight the ongoing housing crisis.

Floor-space index

It is important that we not only legalize multiplexes in name, but make them viable to build. Allowing multiplexes in all residential zones without exempting multiplexes from floor-space index maximums (FSI, defined as floor area divided by lot area) risks making them unviable in large swaths of Etobicoke and the old city without variances that are costly for homeowners and for City staff. See the map below for the current max permitted FSI in Toronto, where grey = no FSI maximum.



Max FSI in Toronto Neighbourhoods

This is why we support the staff recommendations to exempt multiplexes from FSI and replace it with form-based zoning instead. It unifies multiplex zoning across the city instead of letting pre-amalgamation, outdated regulatory tools like FSI get in the way.

Maximum Height

Just like with FSI, there's a wide range of permitted maximum heights across Toronto's residential zones. The map below shows this divide, with some pre-amalgamation boundaries being very obvious in this map as well.

Max Height in Toronto Neighbourhoods



10 metres, as recommended by staff, is sufficient for multiplexes going up to 3 storeys. It is also already permitted for houses in most of North York and old Toronto, but East York, Etobicoke and Scarborough have lower height limits. Bringing the maximum heights to a minimum of 10 metres across the city for multiplexes is a great start in unifying these regimes; however, permitting multiplexes of up to 12 metres citywide would increase viability of fourplexes of four storeys or three storeys with higher ceilings. As the above map shows, there are already many neighbourhoods in Toronto where 11-12m houses are permitted as of right.

Conclusion

As Toronto faces budget challenges, Council needs to make better use of latent infrastructure in Neighbourhoods, particularly those with declining population and undersubscribed schools. In addition, providing more homes in Toronto helps to fight Greenbelt sprawl, reduces commutes, unifies the city and broadens the tax base.

The housing crisis is urgent and multiplexes are just one element in the array of reforms needed to begin addressing it, but it is one that we can change today. Multiplexes had high levels of support (>80%) in City consultations from residents in all areas of Toronto. Let's make multiplexes a success and keep communities thriving. We at More Neighbours Toronto ask you to vote in favour of this item with the form-based measures of density recommended by City Planning staff.

Regards,

Bilal Akhtar More Neighbours Toronto